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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JUNE POTTER, as Special Administrator for  
the Estate of JORDAN J. POTTER, deceased,

Plaintiff,

v.

ARROWHEAD PRODUCTS, individually and  
as successor in interest to Arrowhead  
Rubber Company;  
CRANE CO.;  
GENERAL ELECTRIC COMPANY;  
HENKEL CORPORATION as successor-in-  
interest to Loctite Corporation and Dexter  
Hysol;  
INDUSTRIAL MANUFACTURING  
COMPANY, as successor in interest to  
Arrowhead Products and Arrowhead  
Rubber Company;  
NORTHROP GRUMMAN CORPORATION;  
PARKER-HANNIFIN CORPORATION,  
individually and as successor-in-interest to  
Cleveland Wheel & Brake and Stratoflex  
Products;

CASE NO.: 2:20-cv-00276-RFB-VCF

**SECOND AMENDED COMPLAINT  
AND DEMAND FOR JURY TRIAL**

1 TELEFLEX INCORPORATED;  
2 TITEFLEX COMMERCIAL INC.;  
3 WYETH HOLDINGS LLC f/k/a Wyeth  
4 Holdings Corp. f/k/a American Cyanamid  
5 Corporation;  
6 DOES 1 through 10, inclusive; and  
7 ROE CORPORATIONS 1 through 50,  
8 inclusive,  
9  
10 Defendants.

11 **JURISDICTION AND VENUE**

12 1. Plaintiff June Potter, as Special Administrator for the Estate of Jordan J. Potter,  
13 deceased, is a resident of North Las Vegas, Clark County, Nevada. Prior to his death, Decedent  
14 Jordan J. Potter, was a resident of Las Vegas, Clark County, Nevada.

15 2. Defendant Arrowhead Products, as successor in interest to Arrowhead Rubber  
16 Company, is a Delaware Corporation headquartered in Ohio and doing business in Clark County,  
17 State of Nevada.

18 3. Defendant Crane Co. is a Delaware corporation headquartered in Connecticut and  
19 doing business in Clark County, State of Nevada.

20 4. Defendant General Electric Company is a New York Corporation headquartered  
21 in Massachusetts and doing business in Clark County, State of Nevada.

22 5. Defendant Henkel Corporation, as successor-in-interest to Loctite Corporation  
23 and Dexter Hysol, is a Delaware Corporation headquartered in Connecticut and doing business in  
Clark County, State of Nevada.

6. Defendant Industrial Manufacturing Company, as successor in interest to  
Arrowhead Products and Arrowhead Rubber Company, is a Delaware Corporation headquartered  
in Ohio and doing business in Clark County, State of Nevada.;

7. Defendant Northrop Grumman Corporation is a Delaware Corporation

1 headquartered in Virginia and doing business in Clark County, State of Nevada.

2 8. Defendant Parker-Hannifin Corporation, individually and as successor-in-interest  
3 to Cleveland Wheel & Brake and Stratoflex Products, is an Ohio Corporation headquartered in  
4 Ohio and doing business in Clark County, State of Nevada.

5 9. Defendant Teleflex Incorporated is a Delaware Corporation headquartered in  
6 Pennsylvania and doing business in Clark County, State of Nevada.

7 10. Defendant Titeflex Commercial Inc. is a Delaware Corporation headquartered in  
8 Massachusetts and doing business in Clark County, State of Nevada.

9 11. Defendant Wyeth Holdings LLC f/k/a Wyeth Holdings Corp. f/k/a American  
10 Cyanamid Corporation is a Maine limited liability company headquartered in New Jersey and  
11 doing business in Clark County, State of Nevada. This Court can exercise jurisdiction over the  
12 subject matter of this lawsuit pursuant to the provisions of 28 U.S.C. §1332, in that Plaintiff and  
13 Defendants are citizens of different States and the amount in controversy exceeds \$75,000.

14 12. Venue is proper pursuant to 28 U.S.C. §1391.

15 13. The judicial district in which a substantial part of the events or omissions giving  
16 rise to Plaintiff's claims against Defendant occurred in the District of Nevada.

17 **COMPLAINT**

18 **GENERAL ALLEGATIONS**

19 14. Plaintiff incorporates paragraphs 1 through 13 of this Complaint as though fully  
20 set forth herein.

21 15. The true names and capacities, whether individual, corporate, associate, or  
22 otherwise of Defendants DOE 1 through 10, inclusive, and ROE CORPORATIONS 1 through  
23 50, inclusive, are unknown to Plaintiff; therefore, Plaintiff sues those defendants by these

1 fictitious names. When the true names and capacities of said defendants have been ascertained,  
2 Plaintiff will amend this complaint accordingly. Plaintiff is informed and believes, and thereon  
3 alleges, that each defendant designated as a DOE or ROE CORPORATION is responsible,  
4 negligently or in some other actionable manner, for the events and happenings hereinafter  
5 referred to and thereby directly and proximately caused injuries and damages to Decedent as  
6 alleged in this complaint.

7 16. Pursuant to NRS Section 41.141.5, each of the defendants is jointly and severally  
8 responsible and liable for the acts and/or omissions of co-defendants.

9 17. At all times herein mentioned, each of the named defendants and DOE  
10 defendants, was the successor, successor in business, successor in product line or a portion  
11 thereof, parent, subsidiary, wholly or partially owned, or the whole or partial owner of or  
12 member in an entity engaged in the business of researching, studying, mining and/or milling,  
13 manufacturing, distributing, delivering, supplying, selling, marketing, labeling, re-labeling,  
14 retailing, specifying, recommending, using, installing, and/or removing asbestos and/or asbestos-  
15 containing materials and products. Said entities shall hereinafter collectively be called "alternate  
16 entities". Each of the defendants is liable for the tortious conduct of each successor, successor in  
17 business, successor in product line or a portion thereof, parent, subsidiary, whole or partial  
18 owner, or whole or partially owned entity or entity that it was a member of or funded, that  
19 researched, studied, mined and/or milled, manufactured, distributed, delivered, supplied, sold,  
20 marketed, labeled, re-labeled, retailed, specified, recommended, used, installed, and/or removed  
21 asbestos and/or asbestos-containing materials and products. Each of the following defendants is  
22 liable for the acts of each and every "alternate entity" in that there has been a virtual destruction  
23 of Plaintiff's remedy against each such alternate entity; each defendant has acquired the assets,

1 product line, or a portion thereof, of each such alternate entity; each defendant has the ability to  
2 assume the risk-spreading role of each such alternate entity; and that each defendant enjoys the  
3 goodwill originally attached to each such alternate entity.

4 18. From approximately 1980 to 1999, Decedent Jordan Potter's father, James Potter,  
5 served as an aircraft mechanic in the United States Air Force. From approximately 1980 through  
6 1984 and again from approximately 1992 through 1994, James Potter was stationed at Royal Air  
7 Force Upper Heyford in England. From approximately 1984 through 1991, James Potter was  
8 stationed at Royal Air Force Alconbury in England. In approximately 1994 through 1999, James  
9 Potter was stationed at Nellis Air Force Base near Las Vegas, Nevada.

10 19. James Potter performed repairs to aircraft, including, but not limited to, engine  
11 work and maintenance, repair and replacement of hoses, clamps, grommets, gaskets, fire sleeves,  
12 brakes and other component parts. These component parts contained asbestos which had been  
13 mined, milled, manufactured, distributed, delivered, supplied, sold, marketed, labeled, re-labeled,  
14 specified, recommended, used and/or installed by defendants and/or the alternate entities.

15 20. In the 1980s, James Potter engaged in non-occupational automotive repairs,  
16 including the replacement of brakes on family vehicles. Component parts of the brakes contained  
17 asbestos which had been mined, milled, manufactured, distributed, delivered, supplied, sold,  
18 marketed, labeled, re-labeled, specified, recommended, used and/or installed by defendants  
19 and/or the alternate entities.

20 21. During James Potter's work with and around asbestos-containing products, to  
21 include in the aforementioned occupational and non-occupational activities, asbestos-laden dust  
22 created by working with and around asbestos and asbestos-containing products would  
23 accumulate on his skin, hair and clothing. This dust contained large amounts of asbestos fiber.

1 He brought asbestos fibers from his work with and around asbestos and asbestos-containing  
2 products into the family home and vehicles. The asbestos fibers would become airborne at the  
3 family home and vehicles when he entered. As a result, Decedent Jordan J. Potter was repeatedly  
4 exposed to, inhaled, and breathed asbestos fibers originating from his father working with  
5 asbestos-containing products, as well as when the family home became contaminated with dust  
6 containing asbestos fibers.

7 22. Decedent Jordan J. Potter was exposed to asbestos and/or asbestos-containing  
8 products, which had been mined, manufactured, produced, supplied, distributed, used, and/or  
9 placed into the stream of commerce by defendants and/or the alternate entities and/or was  
10 exposed to asbestos through the use of products manufactured by defendants and/or the alternate  
11 entities. As a direct and proximate result of this exposure, Decedent Jordan J. Potter developed  
12 mesothelioma, and subsequently died.

13 23. Decedent Jordan J. Potter suffered from an asbestos-related cancer, including but  
14 not limited to, mesothelioma. Plaintiff first became aware that Decedent suffered from said  
15 disease on or about November 27, 2018, and subsequently thereto, became aware that the same  
16 was wrongfully caused. Jordan J. Potter died from mesothelioma on February 12, 2022.

17 24. Defendants purposefully availed themselves of the privilege of conducting  
18 activities in Nevada when they sold aircraft and component parts to the United States Air Force  
19 (USAF) or to companies that did business with the USAF. By contracting with the USAF or selling  
20 to companies that did and manufacturing and selling military aircraft and component parts,  
21 Defendants targeted their activity at those states with USAF bases and exhibited an intent and  
22 purpose to serve those markets. Defendants are sophisticated military contractors or suppliers to  
23 military contractors that knew the planes and component parts they manufactured would be

1 stationed at a limited number of USAF bases, including Nellis AFB in Nevada. They also knew  
2 that the planes and parts would be inspected, maintained, repaired and used at Nellis AFB by the  
3 USAF mechanics stationed there. The Defendants knew that injuries suffered from exposure to  
4 their asbestos-containing components would occur in states with USAF bases including Nevada.  
5 Plaintiff's claims arise out of and relate to these activities and actions directed at the State of  
6 Nevada, and the exercise of jurisdiction over Defendants is reasonable.

7         25. As a direct and proximate result of one or more of the foregoing acts or omissions  
8 on the part of Defendants mentioned above, Decedent Jordan J. Potter inhaled, breathed in, or  
9 was otherwise exposed to asbestos fibers, causing Decedent to develop the asbestos cancer  
10 aforesaid, which severely disabled, disfigured, and injured him; Decedent was compelled to  
11 expend and became liable for large sums of monies for hospital, medical, and other health care  
12 services necessary for the treatment of his asbestos-induced cancer and conditions; Decedent  
13 experienced great physical pain and mental anguish as a result of the inhalation of and exposure  
14 to said asbestos fibers; and Jordan J. Potter died from mesothelioma on February 12, 2022.

#### 15 **FIRST CAUSE OF ACTION**

16 (Negligence)

17         26. Plaintiff incorporates paragraphs 1 through 25 of this complaint as though fully  
18 set forth herein.

19         27. At all times herein relevant, defendants and/or the alternate entities had a duty to  
20 exercise reasonable care and caution for the safety of Decedent Jordan J. Potter and others  
21 working with and around the asbestos-containing products of defendants and/or the alternate  
22 entities.  
23

1           28. Defendants and/or the alternate entities knew or should have known that the  
2 asbestos fibers contained in their products had a toxic, poisonous, and highly deleterious effect  
3 upon the health of persons inhaling, breathing, or otherwise being exposed to them. Moreover,  
4 defendants and/or the alternate entities knew or should have known asbestos is a carcinogen.

5           29. Defendants and/or the alternate entities breached their duty and failed to exercise  
6 reasonable care for the safety of Decedent Jordan J. Potter by including asbestos in their  
7 products, even though it was reasonably foreseeable and could or should have been anticipated  
8 that persons such as James Potter working with or around them would carry the asbestos fibers  
9 on his person, hair and clothing into the family home and vehicles where it would become  
10 airborne again and Decedent Jordan J. Potter would inhale, breathe or otherwise be exposed to  
11 great amounts of that asbestos.

12           30. Defendants and/or the alternate entities failed to exercise reasonable care for the  
13 safety of Decedent Jordan J. Potter by including asbestos in their products when defendants  
14 and/or the alternate entities knew or should have known that said asbestos fibers would have a  
15 carcinogenic, toxic, poisonous, and/or highly deleterious effect upon the health of persons  
16 inhaling, breathing, and/or otherwise being exposed to them.

17           31. Defendants and/or the alternate entities failed to provide any or adequate  
18 warnings to persons working with and around the products of the dangers of being exposed to the  
19 asbestos fibers contained in them and how to avoid carrying the asbestos fibers on their person,  
20 hair and clothing into the family home and vehicles.

21           32. Defendants and/or the alternate entities failed to provide any or adequate  
22 instructions concerning the safe methods of working with and around the products, including  
23 specific instructions on how to avoid being exposed to the asbestos fibers in them and how to



1 avoid carrying the asbestos fibers on their person, hair and clothing into the family home and  
2 vehicles.

3 33. Defendants and/or the alternate entities failed to exercise reasonable care for the  
4 safety of Decedent Jordan J. Potter by failing to conduct tests on the asbestos-containing  
5 products designed, manufactured, sold, distributed, delivered, processed, specified, applied,  
6 and/or installed by defendants and/or the alternate entities to determine the hazards to which  
7 workers such as James Potter and those he came into contact with might be exposed as a result of  
8 working with the products.

9 34. Defendants and/or the alternate entities failed to exercise reasonable care for the  
10 safety of Decedent Jordan J. Potter when they designed, manufactured, sold, distributed,  
11 delivered, processed, specified, applied, and/or installed equipment, vehicles, machinery,  
12 technologies and systems that included asbestos-containing components and required and/or  
13 specified the use of asbestos-containing replacement components.

14 35. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
15 alternate entities, Decedent Jordan J. Potter suffered permanent injuries to his person and the  
16 mental and emotional distress attendant thereto all to his general damage in a sum in excess of  
17 \$75,000.00.

18 36. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
19 alternate entities, Decedent Jordan J. Potter incurred liability for physicians, surgeons, nurses,  
20 hospital care, medicine, hospices, x-rays and other medical treatment, the true and exact amount  
21 being unknown to Plaintiff at this time, but Plaintiff prays leave to amend this complaint when  
22 the true and exact cost is ascertained.  
23



1           42.   Persons exposed to the asbestos fibers in defendants' and/or their alternate  
2 entities' asbestos and/or asbestos-containing products did not know of the substantial danger of  
3 using said products. The dangers were not readily recognizable by exposed persons. Defendants  
4 and/or the alternate entities failed to adequately warn of the risks to which Decedent Jordan J.  
5 Potter and others similarly situated were exposed.

6           43.   The defect existed in the said products at the time they left the possession of the  
7 defendants and/or the alternate entities.

8           44.   James Potter's reasonably foreseeable work with and around defendants' and/or  
9 their alternate entities' asbestos-containing products, to include in the aforementioned  
10 occupational and non-occupational activities, created asbestos-laden dust that he brought into the  
11 family home and vehicles and to which Decedent Jordan J. Potter was repeatedly exposed,  
12 inhaled, and breathed.

13           45.   Said defective products caused personal injury to Decedent Jordan J. Potter in that  
14 Decedent Jordan J. Potter suffered from mesothelioma, an incurable cancer caused only by  
15 exposure to asbestos.

16           46.   Defendants and/or the alternate entities, and each of them, researched, studied,  
17 mined and/or milled, manufactured, distributed, delivered, supplied, sold, marketed, labeled, re-  
18 labeled, retailed, specified, recommended, used, installed, and/or removed asbestos and/or  
19 asbestos-containing materials and products with conscious disregard for the safety of exposed  
20 persons who came into contact with said asbestos and/or asbestos-containing product.

21           47.   As a direct and proximate result of the aforesaid conduct of defendants and/or the  
22 alternate entities, Decedent Jordan J. Potter suffered permanent injuries to his person and the  
23

1 mental and emotional distress attendant thereto all to his general damage in a sum in excess of  
2 \$75,000.00.

3 48. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
4 alternate entities, Decedent Jordan J. Potter incurred liability for physicians, surgeons, nurses,  
5 hospital care, medicine, hospices, x-rays and other medical treatment, the true and exact amount  
6 being unknown to Plaintiff at this time, but Plaintiff prays leave to amend this complaint when  
7 the true and exact cost is ascertained.

8 49. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
9 alternate entities, Decedent Jordan J. Potter incurred loss of income, wages, profits and  
10 commissions, a diminishment of earning potential, and other pecuniary losses, the full nature and  
11 extent of which are still unknown; therefore, Plaintiff will request leave to amend this complaint  
12 to conform to proof at the time of trial.

13 50. Defendants' and/or the alternate entities' conduct, as described herein, was  
14 intended by defendants and/or the alternate entities to cause injury to Decedent or was carried on  
15 by these defendants and/or the alternate entities with such conscious disregard for the safety and  
16 health of persons such as Decedent who were exposed to asbestos as to be willful, malicious,  
17 oppressive, fraudulent and outrageous under NRS Section 42.005, thereby entitling Decedent to  
18 punitive damages in the amount in excess of \$75,000 against defendants, each of them.

19 51. Due to defendants' and/or the alternate entities' conduct, it has become necessary  
20 for Plaintiff to retain the law firm of MAUNE RAICHLE FRENCH & MUDD LLC and CRAIG  
21 P. KENNY & ASSOCIATES to prosecute this action, and Plaintiff is entitled to reasonable  
22 attorneys' fees and costs incurred therein.

23 **Third Cause of Action**

## (Civil Conspiracy)

52. Plaintiff incorporates paragraphs 1 through 51 of this complaint as though fully set forth herein, except to the extent any averments may be inconsistent with any alternative liability claims or relief sought in this Count or elsewhere.

53. Defendants and/or the alternate entities, individually, together and/or as a group, have possessed since 1929 medical and scientific data which indicated that asbestos-containing insulation and other materials were hazardous to health. Prompted by pecuniary motives, Defendants and/or the alternate entities, formed a conspiracy agreement to unlawfully harm persons exposed to asbestos, including Decedent Jordan J. Potter.

54. In furtherance of this conspiracy agreement, defendants and/or the alternate entities, individually, together, and/or as a group, willfully and wantonly ignored and/or failed to act upon said medical and scientific data. Rather, they conspired together to deceive and commit fraud upon the public in several aspects: by controlling industry-supported research in a manner inconsistent with the health and safety interest of users and consumers; by successfully tainting reports of medical and scientific data appearing in industry and medical literature; by suppressing the dissemination of certain medical and scientific information relating to the harmful effects of exposure to said products; and by prohibiting the publication of certain scientific and medical articles.

55. Such conspiratorial activities deprived the users, mechanics, laborers, and installers of defendants' and/or the alternate entities' asbestos and/or asbestos-containing products of the opportunity to determine whether they would expose themselves to the unreasonably dangerous asbestos products of said Defendants and/or the alternate entities. As a

1 direct and proximate result of the aforesaid actions, Decedent Jordan J. Potter was exposed as  
2 alleged and contracted the disease set forth herein.

3 56. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
4 alternate entities, Decedent Jordan J. Potter suffered permanent injuries to his person and the  
5 mental and emotional distress attendant thereto all to his general damage in a sum in excess of  
6 \$75,000.00.

7 57. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
8 alternate entities, Decedent Jordan J. Potter incurred liability for physicians, surgeons, nurses,  
9 hospital care, medicine, hospices, x-rays and other medical treatment, the true and exact amount  
10 being unknown to Plaintiff at this time, but Plaintiff prays leave to amend this complaint when  
11 the true and exact cost is ascertained.

12 58. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
13 alternate entities, Decedent Jordan J. Potter incurred loss of income, wages, profits and  
14 commissions, a diminishment of earning potential, and other pecuniary losses, the full nature and  
15 extent of which are still unknown; therefore, Plaintiff will request leave to amend this complaint  
16 to conform to proof at the time of trial.

17 59. Defendants' and/or the alternate entities' conduct, as described herein, was  
18 intended by defendants and/or the alternate entities to cause injury to Decedent or was carried on  
19 by these defendants and/or the alternate entities with such conscious disregard for the safety and  
20 health of persons such as Decedent who were exposed to asbestos as to be willful, malicious,  
21 oppressive, fraudulent and outrageous under NRS Section 42.005, thereby entitling Decedent to  
22 punitive damages in the amount in excess of \$75,000 against defendants, each of them.  
23



1 alternate entities because said asbestos and asbestos-containing products have dangerous  
2 properties and defects that cause asbestosis, other lung damage, and cancer to the users and  
3 others exposed to the asbestos, thereby threatening the health and life of said persons, including  
4 Decedent Jordan J. Potter.

5 65. As a direct and proximate result of the above-mentioned false representations by  
6 defendants and/or the alternate entities, individually, together, and/or as a group, Decedent  
7 Jordan J. Potter sustained the injuries and damages alleged herein.

8 66. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
9 alternate entities, Decedent Jordan J. Potter suffered permanent injuries to his person and the  
10 mental and emotional distress attendant thereto all to his general damage in a sum in excess of  
11 \$75,000.00.

12 67. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
13 alternate entities, Decedent Jordan J. Potter incurred liability for physicians, surgeons, nurses,  
14 hospital care, medicine, hospices, x-rays and other medical treatment, the true and exact amount  
15 being unknown to Plaintiff at this time, but Plaintiff prays leave to amend this complaint when  
16 the true and exact cost is ascertained.

17 68. As a direct and proximate result of the aforesaid conduct of defendants and/or the  
18 alternate entities, Decedent Jordan J. Potter incurred loss of income, wages, profits and  
19 commissions, a diminishment of earning potential, and other pecuniary losses, the full nature and  
20 extent of which are still unknown; therefore, Plaintiff will request leave to amend this complaint  
21 to conform to proof at the time of trial.

22 69. Defendants' and/or the alternate entities' conduct, as described herein, was  
23 intended by defendants and/or the alternate entities to cause injury to Decedent or was carried on



1 by these defendants and/or the alternate entities with such conscious disregard for the safety and  
2 health of persons such as Decedent who were exposed to asbestos as to be willful, malicious,  
3 oppressive, fraudulent and outrageous under NRS Section 42.005, thereby entitling Decedent to  
4 punitive damages in the amount in excess of \$75,000 against defendants, each of them.

5 70. Due to defendants' and/or the alternate entities' conduct, it has become necessary  
6 for Plaintiff to retain the law firm of MAUNE RAICHLE FRENCH & MUDD LLC and CRAIG  
7 P. KENNY & ASSOCIATES to prosecute this action, and Plaintiff is entitled to reasonable  
8 attorneys' fees and costs incurred therein.

9  
10 **Fifth Cause of Action**

11 **(WRONGFUL DEATH/SURVIVAL ACTION)**

12 71. Plaintiff incorporates paragraphs 1 through 70 of this complaint as though fully  
13 set forth herein.

14 72. Each of the Defendants had a duty to exercise a reasonable degree of care,  
15 caution, diligence and foresight.

16 73. Defendants breached such duties and thereby committed negligence causing  
17 serious injuries ultimately resulting in the death of Jordan J. Potter.

18 74. As a direct and proximate result of the aforementioned breach, Jordan J. Potter  
19 suffered severe physical and mental pain and suffering prior to his death.

20 75. That June Potter, Special Administrator of the Estate of Jordan J. Potter, deceased,  
21 hereby states a cause of action pursuant to N.R.S. 41.085 and 41.100 and request all the damages  
22 attended thereto, and allowed by law.  
23

1           76. That the acts of Defendants, and each of them, were extreme and outrageous and  
2 caused Plaintiff's severe emotional distress which is all to Plaintiff's damages in an amount in  
3 excess of Seventy-Five Thousand Dollars (\$75,000.00).

4                                   **Prayer for Relief**

5           WHEREFORE, Plaintiff prays judgment against Defendants as follows

- 6                   1. For special damages in excess of \$75,000;  
7                   2. For general damages in excess of \$75,000;  
8                   3. For punitive damages in excess of \$75,000;  
9                   4. For prejudgment and post-judgment interest;  
10                  5. For reasonable attorneys' fees and costs of suit incurred; and  
11                  6. For such other and further relief as the Court finds just and proper.

12                                   **JURY DEMAND**


13           77. Pursuant to FRCP 38, Plaintiff hereby demands trial by jury.

14           DATED the 25th day of January, 2023

15                                   MAUNE RAICHLE HARTLEY FRENCH & MUDD LLC  
16                                   /s/ Brian F. Ladenburg, Esq.

17           By: \_\_\_\_\_  
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20                                   CRAIG P. KENNY & ASSOCIATES

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